



5020 Chesebro Road, Suite 200, Agoura Hills, CA 91301-2285  
Tel. 818-597-3407 • Fax 818-597-8001 • www.aspeneg.com

**PROJECT MEMORANDUM**  
**SCE WEST OF DEVERS UPGRADE PROJECT**

**To:** John Forsythe, Project Manager, CPUC  
**From:** Vida Strong, Aspen Project Manager  
**Date:** August 1, 2019  
**Subject:** Monitoring Report #73: July 21 to July 27, 2019

## Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison’s (SCE) West of Devers (WOD) Upgrade Project. SCE self-performed work (NTPs #2 and #3) is essentially complete with the exception of substation equipment upgrades and minor telecom tie-ins. 220 kV work (NTPs #4 and #5) is approximately 34% complete.

**CPUC Environmental Monitor (EM):** CPUC LEM Jenny Slaughter was onsite July 23 and 24. CPUC EM, Rosina Goodman, was onsite July 22, 23, and 24 and CPUC EM, Jamie Miner, was onsite July 24, 25 and 26.

## CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs with construction for the WOD Upgrade Project. No additional NTPs are required.

**Table 1 - NTPs**

NTP #	Date Requested	Date Issued	Phase	Description
NTP #1	04/04/17	06/29/17	Material Yards	Construction or use of 10 Material Yards
NTP #2	05/18/17	06/29/17	Substation Upgrades	Upgrades to 5 existing Substations
NTP #3	06/05/17	08/10/17	Distribution, Subtransmission, and Telecom	Construction of the Distribution, Subtransmission, and Telecommunication portions of the Project
NTP #4	07/13/17	09/05/17	Transmission	Transmission Line Construction on private lands
NTP #5	08/07/17	03/29/18	Construction on BLM lands	Transmission Line construction on BLM lands

## Construction & Compliance

A summary of construction and compliance activities is provided below by NTP.

### **Material Yards (NTP #1)**

As defined in NTP #1, Project material yards (MY) include:

- Mountain View #1 MY
- Lugonia MY
- Grand Terrace MY
- Poultry MY

- San Timoteo MY
- Beaumont #1 MY
- Beaumont #2 MY
- Matich MY
- Hathaway #2 MY
- Devers MY

To date, all material yard pre-compliance materials associated with NTP #1 that have been submitted have been approved.

### **Summary of Construction Activity**

1. For the currently approved MYs, all activities are being performed by the contractor operating out of each respective yard.
2. The Poultry MY is being utilized by Barnard Construction and Power Grade Incorporated as their primary base of operations and material/equipment storage location. Work associated with the Poultry MY included material/equipment deliveries and general yard maintenance throughout the monitoring period. No helicopter operations out of Poultry MY occurred during the monitoring period.
3. The Matich MY is being utilized by Barnard Construction primarily for tubular steel pole (TSP) storage. Work associated with the Matich MY included material/equipment deliveries throughout the monitoring period.
4. The Mountain View #1 MY is being utilized by Abercrombie Services as their primary base of operations and materials/equipment storage location.
5. The Beaumont #2 MY is being utilized by CJ/Aldridge Drilling as their primary base of operations and material/equipment storage location. Material/equipment deliveries and general yard maintenance occurred at the Beaumont #2 MY throughout the monitoring period.
6. The Grand Terrace MY will be used primarily as a show-up location for project construction crews.
7. The Devers MY is being utilized by CJ/Aldridge and Power Grade for construction activities on Segment 6. Material/equipment deliveries and general yard maintenance occurred throughout the monitoring period.

### **Environmental Compliance**

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #1 throughout the monitoring period.
2. There was one SWPPP maintenance items or corrective actions associated with NTP #1 recorded during the monitoring period for the Mountain View MY for secondary containment repair at a concrete washout bin. The maintenance item is still open but not overdue.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 identified during the monitoring period.
4. As of the end of the monitoring period, there are no active nests at locations associated with NTP #1 during the monitoring period. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project Nesting Bird Management Plan (NBMP). No nests were removed during the subject reporting period.
5. No special-status species were observed or identified at locations associated with NTP #1 during the monitoring period.

## ***Substations (NTP #2)***

Five substations are identified for improvements in NTP #2. These include:

- Etiwanda Substation
- San Bernardino Substation
- Vista Substation
- El Casco Substation
- Devers Substation

To date, all pre-compliance materials associated with NTP #2 that have been submitted have been approved.

### **Summary of Construction Activity**

1. For the currently approved substation components, all work is being managed by Circle Wood Services with construction support from TTR Substations and SCE crews. Wire stringing connections and wreck-out activities between the project alignment and locations within the substations are being performed by Abercrombie Services.
2. Work activities at the San Bernardino Substation included the installation of below ground conduit for the Telecom Duct Bank inside the substation and south of the substation to Construction Area 1X26.
3. No construction activities associated with the other substations (Devers, El Caso, Vista, and Etiwanda) occurred throughout the monitoring period.

### **Environmental Compliance**

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #2 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #2 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #2.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #2 identified during the monitoring period.
4. As of the end of the monitoring period, there are no active nests located within work areas associated with NTP #2. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
5. No new special status species were observed or identified at locations associated with NTP #2 during the monitoring period.

## ***Distribution, Subtransmission, and Telecommunication Work (NTP #3)***

NTP #3 included distribution, subtransmission, and telecommunication improvements as presented below. These construction activities have been essentially completed, with minor follow up required in response to Project activities.

Distribution improvements included the following:

- Dental 12-kV Distribution Circuit (Dental Circuit)

- Intern 12-kV Distribution Circuit Underbuild (Intern Circuit)
- Reconductor on Juanita Street (Juanita Reconductor)

Subtransmission improvements included the following:

- Removal of San Bernardino–Redlands-Timoteo and the San Bernardino–Redlands-Tennessee 66-kV Lines (Timoteo-Tennessee Removal)
- Relocation of San Bernardino–Redlands-Timoteo 66-kV Lines (Timoteo Relocation)
- Relocation of San Bernardino–Redlands-Tennessee 66-kV Lines (Tennessee Relocation)

Telecommunication improvements included the following:

- San Bernardino Substation Connection to Redlands Inland Empire District Office (San Bernardino Connection)
- Timoteo-Redlands District Office Fiber Optic Cable Connection (Timoteo-Redlands Connection)
- El Casco Substation Connection to Vista Moreno OPGW (El Casco Connection)
- Maraschino Substation Connection to Devers-Valley OPGW (Maraschino Connection)
- El Casco–Banning Connection to Devers-Vista Skywrap (El Casco–Banning Connection)
- Banning Substation Connection to Devers-Valley OPGW (Banning Connection)

### **Summary of Construction Activity**

1. For the currently approved subtransmission and distribution components, construction activities are being performed by Abercrombie Services and SCE crews. No construction activities occurred during the subject monitoring period.
2. As of the closing of this monitoring period, the construction progress of components associated with NTP #3 is as follows:
  - For distribution components, all 19 12-kV poles have been framed, all 12 12-kV underground vaults have been installed, and 7,430 feet of 12-kV duct bank (conduit) and 10,760 feet of 12-kV conductor wire has been installed.
  - For subtransmission components, 119 of 119 66-kV light-weight TSPs have been erected, 19 of 19 TSPs have been erected, and 25,610 feet of 66-kV wire has been installed. Both the Timoteo and Tennessee circuits have been energized. Wreck-out of the existing subtransmission infrastructure is underway.

### **Environmental Compliance**

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #3 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #3 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #3.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #3 identified during the monitoring period.
4. As of the end of the monitoring period, there are no active nests located within work areas associated with NTP #3. If required, nest management, including establishment of buffers and the removal of

inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.

5. No special-status species were observed or identified at locations associated with NTP #3 during the monitoring period.

### ***Transmission Work (NTP #4)***

NTP #4 includes six transmission line segments, identified as Segments 1 through 6, generally moving from west to east.

To date, pre-compliance materials associated with NTP #4, Segments 1 through 6, have been submitted and approved.

#### **Summary of Construction Activity**

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations.
2. Work associated with Segment 1 during the monitoring period included: Wire pulling activities at Construction Areas 1X10 through 1X27 and associated wire stringing sites (see Photo 1), foundation wreck-out activities at Construction Areas 1X20 through 1X26 (see Photo 2); and BMP maintenance at Construction Areas 1X19, 1X20, and 1X21.
3. Work associated with Segment 2 included: Grading and soil import at Construction Area 2X32; grading and soil export at Construction Area 2X04; grading activities at Construction Area 2X23; vegetation clearing and grading at Construction Area WSS-2-2N26-2-MPR28; foundation activities at Construction Areas 2X30 and 2X31 (see Photo 3); BMP maintenance at Construction Area 2X28; tower assembly at Construction Areas 2X07, 2X08, and 2X10 (see Photo 4); and access road maintenance from Hulda Crooks Park to Construction Area 2X04.
4. Work associated with Segment 3 included: Excavating, trenching, and setting the underground vault at Construction Areas 3N01 and TWA-3-3N02-ECS\_Manhole\_MPR-29 (see Photo 5) and hydroseed watering at Construction Areas DR3X22, DR3X40, DR3X60, and DR3X65.
5. Work activities associated with Segment 4 included: BMP installation at Construction Areas 4X03, P123348, PP123350, PP123351, PP123352, PP123353, PP123354, PP123355, PP123356, PP123357, PP123358 and PP12335; vegetation clearing and grading at Construction Area 4X36; grading at Construction Areas 4X37 through 4X40; soil export at Construction Area 4X39; soil import at Construction Area 4X36; road maintenance from Fallen Heroes Park to Construction Area 4X36; and hydroseed watering at Construction Areas 4N59, 4N60, 4N61, and 4N63.
6. Work associated with Segment 5 (which includes sites within Morongo lands along Segment 5 as reported by SCE) included: Tower assembly at Construction Areas 5X49 and 5X52; vegetation clearing, grading, and green waste removal at Construction Areas 5X02, 5X03, 5X04, 5X05, and 5X14; and BMP installation at Construction Area 5X03.
7. Work associated with Segment 6 (non-BLM lands) included: Vegetation clearing and grading at Construction Areas WSS-6-6X09-6X11, WSS-6-6S26-1-MPR29, and T252 (see Photo 6); green waste removal at Construction Area WSS-6-6X09-6X11; rock removal at Construction Area 6S28S; foundation activities at Construction Areas 6X10, 6X11, 6X18, 6X19, 6X23, 6X24, 6S25, 6N26, 6N27, and 6S28; BMP installation at Construction Areas 6X24, SWA-6-6S24-MPR-29, WSS-6-6S26-1-MPR-29, 6S26,

WSS-6-6S26-2-MPR-29, 6N25, SWA-6-6S24-MPR-29, 6N27, 6S45, and 6X47; and road maintenance from Construction Area 6X38 through Construction Area 6X48.

8. Construction updates from SCE will be provided on a bi-weekly basis. The next update will be provided on August 13. As of July 30, construction progress associated with NTP #4 is as follows:
  - 3.5 miles of minor road maintenance were completed in Segments 2 and 6.
  - Grading for foundation installation has been completed at 337 of 469 sites.
  - Foundations are completed for 182 of 386 lattice towers and 64 of 83 TSPs.
  - Erection of 101 of 386 lattice towers and 38 of 83 TSPs have been completed.
  - Erection of 51 of 109 temporary shoofly locations has been completed.
  - Stringing of approximately 3.7 of 8.0 circuit miles of shoofly conductor, 29.4 of 184.0 circuit miles of mainline conductor, and 14.6 of 99.0 circuit miles of OPGW fiber has been completed.
  - Demolition of 80 of 602 existing structures and 81 of 415 existing foundations has been completed.
  - Wire wreck-out has been completed along 17.50 circuit miles.
9. The first required outages (Project Move 1 and Project Move 2) were completed in 2018. Project Move 3 in Segment 3 was completed May 10, 2019. Move 4 in Segment 1 started May 13, 2019 and work under Move 4 was completed July 31. Move 5 in Segments 1, 5, and 6 is scheduled to start August 5 and be completed by February 14, 2020.

### **Environmental Compliance**

1. There were no SCE self-reported observations or incidents during the monitoring period.
2. There were seven SWPPP maintenance items or corrective actions associated with NTP #4 recorded during the monitoring period on Segments 1, 2, and 6. To date, there are two open SWPPP maintenance items or corrective actions that are overdue associated with NTP #4. These include sweeping the construction entrance and maintenance of storm drain protection on Segment 1. On July 24, the CPUC EMs observed several construction entrances on Segment 1 in need of maintenance. The onsite biologist was informed of the issue. Maintenance for the entrances is scheduled for August 1.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #4 identified during the monitoring period.
4. Meetings to review helicopter flight tracks with SCE are occurring every two weeks. Flight tracks are reviewed to monitor compliance with local jurisdiction construction work hours and sensitive receptor avoidance, including residences, schools, and nesting bird avoidance areas. During the helicopter review meeting, three tracks were reviewed from July 13. No incursions or early or late start times occurred. The flight tracks for July 14 were not available. SCE is tracking them down and the tracks will be reviewed during the next meeting. The next flight track review will take place on August 8.
5. As of the end of the monitoring period, there are 12 active nests at locations associated with NTP #4 during the monitoring period. Nests include: burrowing owl, common raven, California thrasher, Cassin's kingbird, mourning dove, Anna's hummingbird, and red-tailed hawk. Buffers have been established per the Project NBMP. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
6. There was one special-status species, loggerhead shrike on Segment 6, observed or identified at locations associated with NTP #4 during the monitoring period.

7. There were 27 new active woodrat middens identified on Segments 5 and 6 during the monitoring period. 10-foot ESA avoidance buffers were staked per the Special-status Small Mammals Avoidance and Minimization Plan. There were no woodrat midden relocations documented during the monitoring period.
8. SCE provided documentation of FAA filings for the Project on September 17 and September 26; FAA concurrence will be required prior to tower installation where applicable. Additional information was provided February 11, 2019. FAA recommended marker balls have been installed on the shoofly spans near El Casco Substation.

**Transmission Work BLM Lands (NTP #5)**

NTP #5 includes the portion of one transmission line segment, identified as Segment 6, which traverses properties managed by the Bureau of Land Management (BLM). NTP #5 was approved by BLM on March 29, 2018. The preconstruction compliance package for BLM lands was deemed acceptable by BLM on February 5, 2019.

**Summary of Construction Activity**

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations.
2. Work activities associated with Segment 6 (BLM lands) during the monitoring period included foundation activities at Construction Areas 6X24 and 6S25; and BMP installation and maintenance at Construction Areas 6X24 and 6S25.

**Environmental Compliance**

See NTP #4 discussion above for environmental compliance activities.

**Temporary Extra Workspaces (TEWS) and Minor Project Refinements (MPRs)**

No TEWS or MPRs were approved during the subject monitoring period. Table 2 summarizes the TEWS and MPRs for the WOD Upgrade Project to date.

**Table 2 - TEWS & MPRs**  
(Updated 08/01/19)

TEWS / MPR	Date Requested	Date Issued	Phase	Description
<b>Temporary Extra Workspaces (TEWS)</b>				
TEWS #1	10-12-17	10-19-17	Maraschino Connection	Access to Beaumont Cherry Valley District water hydrant meter located near the intersection of Highland Springs Avenue and Crooked Creek, Beaumont.
TEWS #2	11-13-17	11-21-17	El Casco– Banning Connection	Water source on Oak Valley Boulevard.
TEWS #3	12-15-17	12-15-17	Banning Connection	Access to existing poles off of Lincoln Street.

<b>TEWS / MPR</b>	<b>Date Requested</b>	<b>Date Issued</b>	<b>Phase</b>	<b>Description</b>
TEWS #4	12-18-17	12-18-17	Banning Connection	Access to existing poles off of Wesley Street.
TEWS #5	12-20-17	12-21-17	Banning Connection	Access to existing poles at intersection of Wesley Street and Old Idyllwild Road
TEWS #6	6-13-18	6-13-18	Timoteo Relocation	Extra workspace to facilitate erection of TSP #4696058 at intersection of Redlands Boulevard and Bryn Mawr Street
TEWS #7	7-27-18	7-30-18	Timoteo Relocation	Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue
TEWS #8	8-27-18	8-28-18	Dental/Intern Circuits	DENIED AND RESCINDED – Extra workspace to facilitate construction along Mission Road
TEWS #9	10-18-18	10-19-18	Timoteo Relocation	Extra workspace for walking path at Bryn Mawr and I-10
TEWS #10	11-05-18	11-05-18	Timoteo Relocation	Extra workspace along Barton and Mountain View Roads for cutover operations.
TEWS #11	01-30-19	01-31-19	Timoteo Relocation	Extra workspace to facilitate the removal of fiber optic cable from overhead poles north along Mountain View Avenue and east along Redlands Boulevard.
TEWS #12	02-06-19	02-07-19	Timoteo Relocation	Extra workspace along Mountain View Avenue for subtransmission pole removal.
TEWS #13	02-26-19	02-26-19	Segment 3	Temporary access road detour for vehicle and equipment travel to/from San Timoteo Canyon Road and Tower Site 3X41.
TEWS #14	05-13-19	05-14-19	Banning Connection	Extra workspace along the east side of south Alola Street, City of Banning.
TEWS #15	05-16-19	05-17-19	Segment 1	HLZ and temporary staging area for construction vehicles, materials, and equipment.
TEWS #16	07-24-19	07-24-19	Segment 2	Concrete V-ditch south of 3012 Prado Lane, accessible from approved access roads to Construction Area 2X18.
<b>Minor Project Refinements (MPRs)</b>				
MPR #1	11-17-17	11-22-17	Maraschino Connection	Revisions to the amount of new underground telecom construction.
MPR #2	12-13-17	12-15-17	Maraschino Connection	Addition of two vault work areas on Highland Springs Road.
MPR #3	12-21-17	12-28-17	El Casco– Banning Connection	Adjustments to alignment along Oak Valley Parkway

<b>TEWS / MPR</b>	<b>Date Requested</b>	<b>Date Issued</b>	<b>Phase</b>	<b>Description</b>
MPR #4	12-27-17	1-3-18	Maraschino/ El Casco– Banning Connections	Continued use of two fire hydrants previously approved as TEWS #1 and TEWS #2
MPR #5	1-16-18	1-22-18	Banning Connection	Continued use of access routes described in TEWS #3, 4, and 5 and temporary access paths through private property along Coyote Trail
MPR #6	2-8-18	2-12-18	Project-wide	Use of 10 water sources to support construction activities
MPR #7	2-23-18	2-28-18	Poultry MY	Temporary water and electrical supply to yard
MPR #8	2-27-18	3-2-18	El Casco Connection/ Segment 1	New telecom splice location and single new steel pole installation
MPR #9	3-26-18	3-27-18	El Casco Connection	Telecom work areas along El Casco Substation access road
MPR #10	4-6-18	4-9-18	Mountain View #1 MY/All subtrans	Additional work spaces at Mountain View #1 MY entry and at subtransmission improvements work areas
MPR #11	5-4-18	5-8-18	Tennessee Relocation	Relocation of 5 subtransmission structures from the east side to the west side of Nevada Street
MPR #12	5-14-18	5-16-18	Timoteo Relocation	Additional work space for TSP erection at Bryn Mawr Avenue and Interstate 10.
MPR #13	5-23-18	5-25-18	Project-wide	Addition of encased fire hose to O’Grady Court water source and use of 17 water sources to support construction activities
MPR #14	5-24-18	5-31-18	Timoteo/ Tennessee Relocations	Location shift of 3 TSPs and 1 vault location
MPR #15	5-31-18	6-4-18	Poultry MY	Paving of access road and trailer complex area
MPR #16	6-11-18	6-13-18	Banning Connection	Shift of horizontal directional drilling (HDD) alignment through Smith Creek and addition of walking paths along Coyote Trail
MPR #17	6-20-18	6-22-18	Dental Circuit/ Tennessee Relocation	Additional work space along Mission Road, Lugonia Avenue, and Nevada Street
MPR #18	8-3-18	8-7-18	Timoteo Relocation/ Beaumont #2 MY	Expansion of vault installation work area off Mountain View Avenue and new water source near Beaumont #2 MY
MPR #19	8-13-18	8-20-18	Segment 4	Additional work space requests at Sites 4N58, 4N59, and 4N64

TEWS / MPR	Date Requested	Date Issued	Phase	Description
MPR #20	8-21-18	8-27-18	Banning Connection	Use of unpaved access road west of Smith Creek
MPR #21	10-4-18	10-10-18	Project-wide/ Segments 3&4	Use of 6 water sources, installation of water tank, use of access road, and expansion of WSS
MPR #22	11-19-18	11-20-18	Subtrans and Telecom	Pole replacement, switch replacement, and shift in underground telecom route.
MPR #23	12-11-18	12-21-18	Transmission	Site 3N32 and Move 3 work areas.
MPR #24	01-15-19	01-28-19	Transmission	Additional Wire Stringing Site in Segment 1.
MPR #25	03-11-19	03-14-10	Transmission	Additional work area west of Supersite 3X55, Segment 3.
MPR #26	04-02-19	04-04-19	Transmission	Use of Prado Lane access road (Segment 2) and two existing hydrants (Segment 6).
MPR #27	04-30-10	05-01-19	Transmission	Use of two existing hydrants (Segment 1), water tank (Segment 2), and helicopter work area (Segment 3).
MPR #28	05-31-19	06-06-19	Transmission	Extra work space areas, including helicopter landing zones and access roads, on Segments 1, 2, and 6.
MPR #29	06-27-19	07-03-19	Transmission	Extra work space areas for equipment/material staging, wire stringing, and telecom work, on Segments 3, 4, and 6.

## CPUC Compliance Incidents, Project Memoranda (PMs) and Non-Compliance Reports (NCRs)

Table 3 summarizes the CPUC Incidents, PMs, and NCRs issued to date.

**Table 3**  
**CPUC Incidents, Project Memoranda, and Non-Compliance Reports**  
(Updated 08/01/19)

Incident/ PM/NCR	Regulatory Requirement	Date Issued	Phase	Description
Level 1 Incident	Traffic Control Plan	01-30-18	Banning Connection	Traffic control was set up in such a way that diverted flow into active work area and deviated from approved Traffic Control Plan.
Level 1 Incident	MM WIL-1b	04-19-18	Timoteo/ Tennessee Relocation	A portable water tank was observed uncovered for four consecutive days.
Level 1 Incident	MM VEG-1a	5-24-18	El Casco Substation	Equipment was staged outside of approved disturbance limits for at least 1-2 days.
Level 1 Incident	MM AQ-1a	8-15-18	Banning Connection	Fugitive dust observed from construction activities.

<b>Incident/ PM/NCR</b>	<b>Regulatory Requirement</b>	<b>Date Issued</b>	<b>Phase</b>	<b>Description</b>
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved access road.
Level 1 Incident	MM WIL-1b	8-15-18	Banning Connection	Use of unapproved staging area.
Level 1 Incident	Fire Management Plan	9-18-18	Segment 4	Lack of adequate fire abatement equipment at 3 locations.
Level 1 Incident	Fire Management Plan	9-20-18	Segment 4	Lack of adequate fire abatement equipment
Level 1 Incident	HH-1a	10-17-18	Segment 4	Lack of proper secondary containment for 4 pieces of equipment.
Level 1 Incident	N-1a	10-17-18	Segment 4	Work outside of approved hours
Level 1 Incident	WIL-1b	10-18-18	Grand Terrace MY	Lack of proper covering for pipes between 1.5” to 4”
Level 1 Incident	N-1a	10-18-18	Segment 4	Work outside of approved hours
Level 1 Incident	AQ-1a	10-30-18	Grand Terrace MY	Fugitive Dust Emissions Outside of Property Boundaries at the Grand Terrace Yard.
Level 1 Incident	WIL-1b	01-24-19	Segment 3	Pipes/tubing left open at Sites 3X08 and 3X10.
Level 1 Incident	AQ-1a	02-13-19	Segment 3	Fugitive dust along Segment 3 access road to 3X06.
Level 2 Incident	VEG-3a	02-13-19	Segment 3	Offsite sediment discharge from access road into JD ID 3054.

## PROJECT PHOTOGRAPHS



Photo 1 – Wire stringing activities on Segment 1 (July 23, 2019).



Photo 2 – Foundation wreck-out activities on Segment 1 (July 23, 2019).



Photo 3 – Foundation excavation activities on Segment 2 (July 22, 2019).



Photo 4 – Tower assembly on Segment 2 (July 23, 2019).



Photo 5 – Cable conduit installation on Segment 3 (July 22, 2019).



Photo 6 – Site grading on Segment 6 (July 22, 2019).